

COMPLEMENTARY COATINGS CORP. D/B/A INSL-X

EXECUTIVE OFFICE

101 PARAGON DRIVE ♦ MONTVALE, NEW JERSEY 07645
(T) 201-949-6000 • (F) 201-949-6831

April 18, 2014

VIA UPS Second Day Delivery

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Ave., MS-211
Edison, NJ 08837

Re: Request for Information Pursuant to Section 104 of CERCLA
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

Dear Ms. Hriczko:

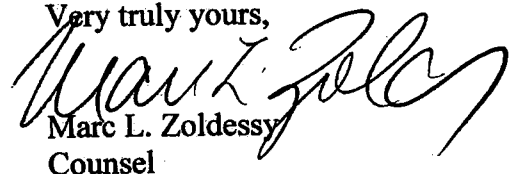
This letter will serve as a follow up to our telephone conversation of April 17, 2014 in regard to the above referenced matter.

As you were previously advised by my letter dated January 29, 2014, Complementary Coatings Corp. ("CCC") was incorporated on December 10, 2007. On March 3, 2008, CCC purchased certain select assets from INSL-X PRODUCTS CORPORATION ("INSL-X"). This was not a stock acquisition and with the exception of certain existing contractual obligations, CCC did not assume any liabilities of INSL-X. It is our understanding that INSL-X had purchased assets and/or stock of Lenmar, Inc. years prior to our transaction. However, I am not in a position to provide you with any details concerning the transaction between INSL-X and Lenmar, Inc. because CCC was not a party to the transaction. CCC did purchase the trademark "Lenmar" from INSL-X but did not assume any liabilities in that regard.

As previously advised, CCC became a tenant at 4701 O'Donnell Street, Baltimore, Maryland 21224 pursuant to a lease dated March 3, 2008. All manufacturing activity at the subject locations ceased in September 2013 and the subject location is no longer operational. Further, CCC has no knowledge or records indicating that it ever transported any waste to the Superior Barrel and Drum Company, Inc. site located at 798 Jacob Harris Lane, Elk, Gloucester County, New Jersey.

Please do not hesitate to contact me if I can be of further assistance. Thank you.

Very truly yours,


Marc L. Zoldessy
Counsel

MLZ/sbb

490151



COMPLEMENTARY COATINGS CORP. D/B/A INSL-X

EXECUTIVE OFFICE
101 PARAGON DRIVE ♦ MONTVALE, NEW JERSEY 07645
(T) 201-949-6318 • (F) 201-474-1169

January 29, 2014

Via UPS Second Day Delivery
Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, NJ 08837

Re: Request for Information Pursuant to Section 104 of CERCLA
Superior Barrel and Drum site, Elk, Gloucester County, New Jersey

Dear Ms. Hriczko:

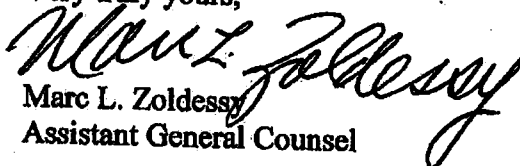
The undersigned is counsel to Complementary Coatings, Corp. ("CCC") and I am in receipt of your Request for Information Pursuant to Section 104 of CERCLA dated January 9, 2014 in regard to the above referenced site. For your information, be advised that Complementary Coatings Corp. is a corporation incorporated under the laws of the State of New York on December 10, 2007.

CCC became a tenant at 4701 O'Donnell Street, Baltimore, Maryland 21224 pursuant to a lease dated March 3, 2008. All manufacturing activity at the subject locations ceased in September 2013 and the premises is no longer operational.

Please be advised that CCC has no knowledge or records indicating that it ever transported any waste to the Superior Barrel and Drum Company, Inc. site located at 798 Jacob Harris Lane, Elk, Gloucester County, New Jersey. Please do not hesitate to contact me if I can be of further assistance.

Thank you.

Very truly yours,


Marc L. Zoldessy
Assistant General Counsel

MLZ/sbb

c: William Tucker, Esq. (via UPS Second Day Delivery)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

JAN - 9 2014

PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Lenmar, Inc. Wood Finishes
4701 O'Donnell Street
Baltimore, MD 21224
Attention: Robert L. Hechley, Manager

Re: Request for Information Pursuant to Section 104 of CERCLA
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

Dear Sir/Madam:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9601, et seq. (also known as the "Superfund" law). For your information, a copy of the Superfund law may be found at www.epa.gov/superfund/action/law/index.htm.

This letter seeks your cooperation in providing information and documents relating to the Superior Barrel and Drum Superfund Site (the "Site") located at 798 Jacob Harris Lane, (formerly New Jersey Avenue), Elk, Gloucester County, New Jersey. EPA encourages you to give this letter your immediate attention. A complete and truthful response must be provided to the attached Request for Information within 30 days of your receipt of this letter.

EPA has documented the release and threatened release of hazardous substances into the environment at the Site. Our records indicate that your company may have done business with Superior Barrel and Drum Company, Inc. ("SBD"). EPA requests your cooperation with regard to answering the attached questions concerning your business relationship with SBD, if any, and providing the requested supporting documentation.

Past operations at the Site included the recycling, reprocessing and reconditioning of drums. The five and a half acre, unpaved Site consists of two former operational areas (2.4 acres and 0.32 acre in size). The main area includes a drum reprocessing building with containers located throughout. The second operational area was mainly utilized for

Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by our Request for Information, it is necessary that you promptly notify EPA. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

See the enclosed Instructions for information on how to respond to the enclosed questions and/or information requests. Your response to this Request for Information should be mailed to:

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue, MS-211
Edison, New Jersey 08837

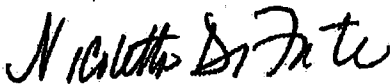
A copy of your reply should be sent to:

Mr. William Tucker, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, New York 10007

If you have any questions regarding this Request for Information, or would like to discuss this matter with EPA, please contact Ms. Hriczko at (732) 321-6647. Inquiries from attorneys should be addressed to Mr. Tucker at (212) 637-3139.

We appreciate and look forward to your prompt response to this matter.

Sincerely yours,



Nicoletta DiForte, Senior Enforcement Policy Advisor
Emergency and Remedial Response Division

Enclosures

Instructions for responding to request for information

A. Directions

1. A complete and separate response should be given for each question. For each question contained in this letter, if information or documents responsive to this information request are not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Identify each answer with the number of the question and the subpart to which it responds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.
3. Provide responses to the best of your company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Consult with all present and past employees and agents of your company whom you have reason to believe may be familiar with the matter to which the question pertains.
4. In answering each question, identify each individual and any other source of information (including documents) that were consulted in the preparation of the response to the question.
5. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that your company supplement its response to EPA within 30 days from the date such information or documents became available to it.
6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number, and the reasons for your belief.
7. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the documents with their addresses.
8. If anything is omitted from a document produced in response to the Request for Information, state the reason for, and the subject matter of, the omission.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that your company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that it is not and has not been obtainable by legitimate means without your company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to your company.

B. Definitions

1. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
2. The term "Site" shall mean the 798 Jacob Harris Lane property, which comprises the Superior Barrel and Drum Company, Inc. location.
3. The terms "the Company" and "your Company" shall mean the business addressee which is the recipient of this letter and its predecessors, successors, subsidiaries, divisions, branches, officers, managers, employees, contractors, trustees, partners, assigns or agents.
4. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances including pollutants, or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
5. The term "hazardous substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances, products or other nonhazardous substances.
6. The term "industrial waste" shall mean any solid, liquid or sludge or any mixture thereof which possesses any of the following characteristics:

13. The term "real estate" shall mean and include, but not be limited to the following:
~~land, buildings, a house, dwelling place, condominium, cooperative apartment,~~
office or commercial building, including those located outside the United States.
14. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discarding of any Container or other closed receptacle containing any hazardous substance pollutant, or contaminant.
15. All terms not defined herein shall have their ordinary meaning, unless such terms
~~are defined in CERCLA or RCRA, in which case the statutory definitions shall~~
apply.

REQUEST FOR INFORMATION

General Information about the Company

1.
 - a. State the correct legal name of the Company.
 - b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.
 - c. State the name(s) and address(es) of the officer(s) of the Company.
 - d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.
 - e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.
 - f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.
2.
 - a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

from the Company to or from SBD, etc.)

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:
- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and
 - (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.
7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.
8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:
- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and
 - b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.
10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of _____:

County of _____:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this
day of _____, 2014

Notary Public

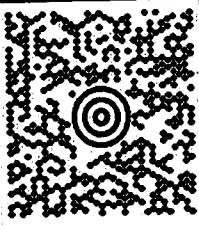

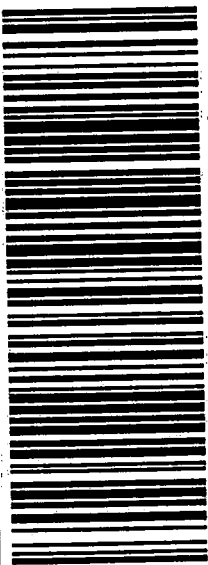

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
Hand the package to any UPS driver in your area.
Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

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|--|--|---|--|
| SHIP TO: SUSAN BYGRAVE 201-949-6348 BENJAMIN MOORE 101 PARAGON DRIVE MONTVALE NJ 07645 | | 1.0 LBS LTR 1 OF 1 | |
| SHIP TO: BONNIE HRICZKO 732-321-6647 USEPA REGION II REMOVAL ACTION BR 2890 WOODBRIDGE AVE. - MS-211 EDISON NJ 08837-3659 | | NJ 089 9-02 | |
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| UPS 2ND DAY AIR | | 2 | |
| TRACKING #: 1Z 078 1E5 02 9132 6002 | |  | |
| BILLING: P/P | |  | |
| DEPARTMENT NAME: LEGAL DEPT Reference # 3: EPA - Superior Barrel and Drum Sit WINTERBRO 48.04 01/2014 | | | |



101 Paragon Drive
Montvale, NJ 07645

Bonnie Hriczko
Removal Action Branch
USEPA, Region II